PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

BRC Rubber Group, Montpelier Division
623 West Monroe
Montpelier, Indiana 47359

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 009 - 7492 - 00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary miscellaneous automotive rubber parts manufacturing and coating source.

Responsible Official:	Thom Maher
Source Address:	623 West Monroe, Montpelier, Indiana 47359
Mailing Address:	589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Phone Number:	219 - 693 - 2171
SIC Code:	3069
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) natural gas-fired boiler, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.

(c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.

(d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.

(e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.

(f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993,exhausting to Stack S8, capacity: 280 automotive parts per hour.

(g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.

(h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity:2,000 automotive parts per hour.

(i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.

(j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: 300 automotive parts per hour.

(k) One (1) dip and spin adhesive system, known as DIPSPIN, installed in 1997, exhausting to Stack S12a, capacity: 35,000 automotive parts per hour.

(l) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.

(m) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.

(n) One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.

(o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.

(p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.

(q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.

(r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.

(s) One (1) chain-on-edge dried, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.

(t) One (1) paint booth (silver machine), known as PB8, equipped with dry filter for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 450 automotive parts per hour.

(u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day (326 IAC 6-3).

(a) PMILL, RPRCSS rubber making/primary mill.

(b) SMILL, RPRCSS rubber making/secondary mill.

(c) RCOAT, rubber coating.

(d) PMIX, primary, Banbury mixer.

(e) SMIX, secondary, Shaw mixer.

(f) SBlAST, self-contained sand blaster.

(g) CSILOs, three (3) carbon silos.

(h) Phosline phosphate line.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) & (13)] [326 IAC 2-7-6(1) & (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superceded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(2) If IDEM, OAM,, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(A) A brief description of the change within the source;

(B) The date on which the change will occur;

(C) Any change in emissions; and

(D) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-7-10.5.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, when applicable). The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.

(c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) One (1) natural gas-fired boiler, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2-3(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from the two (2) natural gas-fired boiler, BLR1 and BLR2, used for indirect heating purposes which was existing and in operation on or before September 21, 1983, shall in no case exceed 0.666 pounds of particulate matter per million British thermal units heat input.

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.3 Reporting Requirements

The natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.

(d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.

(e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.

(f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993, exhausting to Stack S8, capacity: 280 automotive parts per hour.

(g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.

(h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity:2,000 automotive parts per hour.

(i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.

(j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: 300 automotive parts per hour.

(k) One (1) dip and spin adhesive system, known as DIPSPIN, installed in 1997, exhausting to Stack S12a, capacity: 35,000 automotive parts per hour.

(l) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.

(m) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.

(q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.

(r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.

(s) One (1) chain-on-edge dried, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.

(t) One (1) paint booth (silver machine), known as PB8, equipped with dry filter for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 450 automotive parts per hour.

(u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The dip and spin adhesive system, known as DIPSPIN. shall use less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit makes 326 IAC 8-1-6 not applicable.

D.2.2 HAPs [326 IAC 2-4.1-1]

The total potential to emit a single and combination of HAPs from DIPSPIN shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. In addition, any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the DIPSPIN operation. Therefore, these HAPs limits will render 326 IAC 2-4.1-1 not applicable to the DIPSPIN.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) overspray from the paint booths, known as PB 1 through PB8, will be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DIPSPIN.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 HAPs

Compliance with the HAPs usage limitation contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 VOC and HAPs Emissions

(a) Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

(b) Compliance with Condition D.2.2 shall be demonstrated within 30 days of the end of each month based on the single and combination of HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Particulate Matter (PM)

The dry filters and water wash for PM control shall be in operation at all times when paint booths, known as PB1 through PB8, are in operation.

D.2.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S5 - S8 and S20 while one or more of the paint booths (PB1, PB2, PB3, PB4 and PB8) are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks S9, S10, and S11 while one or more of the paint booths (PB5, PB6 and PB7) are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.1 and D.2.2 for DIPSPIN.

(1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAPs usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Conditions D.2.9 and D.2.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(n) One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.3.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

(a) Pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:

(1) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects or the cleaning machine shall be designed or operated such that it has a reduced room draft as described in 40 CFR63.463(e)(2)(ii).

(2) The Permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR63.465(a) and appendix A to 40 CFR 63 Subpart T.

(3) Cleaning machine shall have a freeboard ratio of 0.75 or greater.

(4) Cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

(5) Cleaning machine shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.

(6) Cleaning machine shall have a primary condenser.

(7) Cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

(b) Pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operation are applicable:

(1) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place or control air disturbances across the cleaning machine opening(s) by creating a reduced room draft as described in 40 CFR63.463(e)(2)(ii).

(2) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.

(3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.

(4) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.

(5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.

(6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.

(7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

(8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

(9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.

(10) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.

(11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.

(12) Sponges, fabric, wood, and paper products shall not be cleaned.

(c) That pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:

(1) The Permittee shall conduct monitoring of each control device used to comply with §63. 463 as provided in 40 CFR63. 466, monitoring procedures.

(2) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:

(A) When using a working-mode cover the Permittee shall:

(i) ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.

(ii) ensure that the working-mode cover is maintained free of cracks, holes, and other defects.

(B) When using an idling-mode cover the Permittee shall:

(i) ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.

(ii) ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

D.3.3 Open Top Vapor Degreaser Operation [326 IAC 8-3-3]

The owner or operator of an open top vapor degreaser, VDG, shall:

(a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;

(b) keep the cover closed at all times except when processing work loads through the degreaser;

(c) minimize solvent carryout by:

(1) racking parts to allow complete drainage;

(2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);

(3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

(4) tipping out any pools of solvent on the cleaned parts before removal; and

(5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;

(d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;

(e) not occupy more than half of the degreaser's open top area with the workload;

(f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;

(g) never spray above the vapor level;

(h) repair solvent leaks immediately, or shut down the degreaser;

(i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;

(j) not use workplace fans near the degreaser opening;

(k) not allow visually detectable water in the solvent exiting the water separator; and

(l) provide a permanent, conspicuous label summarizing the operating requirements.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.3.4 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63.465]

The Permittee is not required to test this facility by this permit or by 40 CFR Part 63; 40 CFR 63.465 Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

The Permittee shall determine the idling emission rate of the solvent cleaning machine using reference method 307 in Appendix A to this part.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Monitoring Procedures [326 IAC 2-7-6(1)]

Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

(a) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.

(b) The Permittee shall monitor the hoist speed as described below:

(1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.

(2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.

(3) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.

(4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

(c) The Permittee shall establish the monitoring frequency for each control and submit it to the commissioner for approval in the initial test report.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.6 Record Keeping Requirements

(a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,

(1) Owners's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.

(2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

(3) The Permittee shall maintain records of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during the test.

(4) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.

(b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:

(1) The results of control device monitoring required under 40 CFR63.466.

(2) Information on the actions taken to comply with 40 CFR63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

(3) Estimates of annual solvent consumption for each solvent cleaning machine.

D.3.7 Reporting Requirements

A summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) Submit an initial notification report immediately. The report shall include the following information:

(1) The name and address of the owner or operator.

(2) The address of the solvent cleaning machine.

(3) A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.

(4) The date of installation for the solvent cleaning machine.

(5) The anticipated compliance approach for the solvent cleaning machine.

(6) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.

(b) Submit an initial statement of compliance for the solvent cleaning machine no later than 30 days after the issuance of this permit. This statement shall include:

(1) The name and the address of the owner or operator.

(2) The address (i.e., physical location) of the solvent cleaning machine(s).

(3) A list of the control equipment used to achieve compliance for solvent cleaning machine.

(4) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.

(5) The Permittee shall submit a test report for tests of idling emissions meeting the specifications in Method 307 of Appendix 40 CFR 63, Subpart T. This report shall comply with the following requirements:

(A) The test must be on the same specific model cleaner used at the source. The test can be done by the Permittee of the affected machine or can be supplied by the vendor of that solvent cleaning machine or a third party.

(B) The report must clearly state the monitoring parameters, monitoring frequency and the delineation of exceedances for each parameter.

(C) If a solvent cleaning machine vendor or third party test report is used to demonstrate compliance, it shall include the following for the solvent cleaning machine tested: Name of the person(s) or company that performed the test, model name, the date the solvent cleaning machine was tested, serial number, and a diagram of the solvent cleaning machine tested.

(D) If a solvent cleaning machine vendor or third party test report is used, the Permittee shall comply with the following requirement:

Demonstrate to the commissioner's satisfaction that the solvent emissions from the solvent cleaning machine for which the test report is being submitted are equal to or less than the solvent emissions from the solvent cleaning machine in the vendor test report.

(c) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:

(1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR63.463(d)(10)."

(2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.

(d) The Permittee shall submit an exceedance report to the commissioner semiannually except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calender half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:

(1) Information on the actions taken to comply with 40 CFR63. 463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

(2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

(3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

(e) That pursuant to 40 CFR63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:

(1) The source has demonstrated a full year of compliance without an exceedance.

(2) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T.

(3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.

(f) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.

(p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the GBLAST1 and GBLAST2 facilities shall not exceed 3.10 and 3.82 pounds per hour when operating at a process weight rate of 0.660 and 0.900 tons per hour, respectively.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.4.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions from the grit blast facilities at all times that the GBLAST1 and/or GBLAST2 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.4 Visible Emissions Notations

(a) Daily visible emission notations of the grit blast stack exhausts 15a and 15b shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the grit blasters, at least once per shift when the GBLAST1 and GBLAST2 is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.4.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the grit blaster operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of the GBLAST1 and GBLAST2 stack exhausts.

(b) To document compliance with Condition D.4.5, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(b) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.6 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day (326 IAC 6-3):

(a) PMILL, RPRCSS rubber making/primary mill.

(b) SMILL, RPRCSS rubber making/secondary mill.

(c) RCOAT, rubber coating.

(d) PMIX, primary, Banbury mixer.

(e) SMIX, secondary, Shaw mixer.

(f) SBlAST, self-contained sand blaster.

(g) CSILOs, three (3) carbon silos.

(h) Phosline phosphate line.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from these facilities shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_x, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
NATURAL GAS-FIRED BOILER CERTIFICATION

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

(can omit identification of boiler affected if only one gas boiler at this plant)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: DIPSPIN
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC This Month (tons per month)	VOC Previous 11 Months (tons per month)	VOC 12 Month Total (tons per month)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: DIPSPIN
Parameter: Single and Combination of HAPs
Limit: Less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively.

YEAR: _____

Month	This Month (tons/month)		Previous 11 Months (tons/month)		12 Month Total (tons/month)	
	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/ Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	**BRC Rubber Group, Montpelier Division**
Source Location:	**623 West Monroe, Montpelier, Indiana 47359**
County:	**Blackford**
SIC Code:	**3069**
Operation Permit No.:	**T 009-7492-00002**
Permit Reviewer:	**Mark L. Kramer**

On April 25, 2000 the Office of Air Management (OAM) had a notice published in the News Times in Hartford City, Indiana, as well as on May 11, 2000 in the Montpelier Herald, stating that BRC Rubber Group, Montpelier Division, had applied for a Part 70 Operating Permit to operate miscellaneous automotive rubber parts manufacturing and coating source with baghouses, dry filters and water washes for particulate matter control. The notices also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On May 25, 2000, Anne Tkacz of Avant Group, Inc., submitted comments on behalf of BRC Rubber Group, Montpelier Division, on the proposed Part 70 Operating Permit. The comments are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Comment 1:

BRC Rubber Group would like to take the opportunity to state that it was the understanding of the management, at the time of the ownership transfer in late 1993 from Shellar Globe to BRC, that BRC could operate up to 10 spray paint booths under the Permit 05-05-89-0058. BRC thought that booths could be added without getting new permits as long as there were no more than 10 in operation.

Response 1:

The construction and/or installation dates coupled with the permit issuance dates as well as the specific equipment identified in the permit determines if the equipment has been permitted. Ten (10) surface coating booths were permitted by OP 05-05-89-0058 issued on May 28, 1985. This permit was subsequently transferred to BRC Rubber Group on December 29, 1993. Therefore, any surface coating booths constructed after 1993 that were not covered by the original permit issued in 1985 required appropriate review pursuant to 326 IAC 2-1. Thus, all equipment that had installation dates after 1993 as stated in the application were considered to be constructed and operated without a permit. No changes to the Technical Support Document or the proposed permit are required.

Comment 2:

Please add capacity: “300 automotive parts per hour” at the end of Source Summary A.2 (j) (page 6 of 51), Facility Operation Conditions D.2 (j) (page 30 of 51), and the Technical Support Document (TSD) Unpermitted Emission Units and Pollution Control Equipment (j) (page 2 of 14).

Comment 3:

Please add 32.0 pounds of grit per hour at the end of Source Summary A.2 (p) (page 6 of 51), Facility Operation Conditions D.4 (p) (page 41 of 51), and the Technical Support Document (TSD) Unpermitted Emission Units and Pollution Control Equipment (p) (page 2 of 14).

Responses 2 and 3:

Conditions A.2(j), A.2(p), D.2(j) and D.4(p) have been revised as follows to add the capacities of the emission units.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: **300 automotive parts per hour.**

(p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour **and 32.0 pounds of grit per hour**.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: **300 automotive parts per hour.**

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour **and 32.0 pounds of grit per hour**.

Comment 4:

The actual SO_2 emissions are estimated to be 0.006 tons/year as opposed to 0.06 tons/year as reported on page 6 of 14 in the Technical Support Document. See Boiler Emission Calculations for Form PI-02 in application submitted May 1999.

Response 4:

IDEM acknowledges the inadvertent typographical mistake in reporting the actual SO_2 emissions. These actual SO_2 emissions should have been 0.006 tons per year, rather than 0.06 tons per year. No conditions in the proposed permit or other rule determinations in the Technical Support Document are affected by this mistake.

Comment 5:

The Boilers' VOC Limited Potential to Emit (tons/year) listed on page 7 of 14 in the Technical Support Document should read 0.70 according to Boiler Emission Calculations for Form PI-02 in application submitted May 1999 and Appendix A, page 1 of 16 in the Technical Support Document.

Response 5:

Page 1 of 16 of Appendix A confirms that the potential VOC emissions for the two (2) boilers are 0.704 tons per year rather than 0.070 tons per year as listed on page 7 of 14 of the TSD. The Limited Potential to Emit table on page 7 of 14 of the TSD has been updated as follows:

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Boilers	0.240	0.970	0.080	~~0.070~~ **0.704**	10.8	12.8	0.231
PB1, 2, 3 & 5	1.98	1.98	0.00	49.5	0.00	0.00	144
PB4	0.231	0.231	0.00	11.5	0.00	0.00	30.2
PB6 & 7	0.449	0.449	0.00	22.8	0.00	0.00	56.6
DIPSPIN	0.00	0.00	0.00	<25.0	0.00	0.00	24.4
HDIP & DLINE	0.00	0.00	0.00	9.22	0.00	0.00	3.79
PB8	0.236	0.236	0.00	11.2	0.00	0.00	Single HAP< 10 12.1
DIP	0.00	0.00	0.00	11.3	0.00	0.00	5.85
HPB1, 2 & 3	0.00	0.00	0.00	34.4	0.00	0.00	65.2
FSTOR	0.00	0.00	0.00	1.68	0.00	0.00	1.68
VDG	0.00	0.00	0.00	12.0	0.00	0.00	12.0
GBLAST1 &2	2.15	2.15	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.0	5.0	1.00	5.00	3.00	2.00	3.00
Total Emissions	10.286	11.016	1.08	~~193.67~~ **194.3**	13.8	14.8	359

The correction of the VOC potential emissions from the boilers has no effect on any rule determination or proposed conditions in the permit.

Comment 6:

BRC Rubber Group, Montpelier Division is a Minor Source under PSD rules, as stated in Section A.1, Source Summary (page 5 of 51). The first full paragraph of page 9 of 14 of the TSD is incorrect; the source is not considered Major Source under PSD rules.

Response 6:

As stated in Section A.1, this source is a minor source under PSD rules. The TSD incorrectly stated that this source would be considered a major PSD source after the construction of the latest modification. Therefore, although the TSD does not get updated, the following section of the TSD has been revised for clarification:

326 IAC 2-2 Prevention of Significant Deterioration

This modification is a minor modification to an existing minor PSD source since all emissions, after controls and limits are less than two hundred and fifty (250) tons per year. After this modification, all potential emissions after controls and applicable limits for the entire source are still less than two hundred and fifty (250) tons per year and the source is not considered to be one of the 28 major PSD source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply and the source is categorized as a minor source under PSD rules.

~~The source will be considered an existing major PSD source after the construction of this modification since PM and PM_{10} emissions after controls and limits will exceed two hundred and fifty (250) tons per year.~~

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**BRC Rubber Group, Montpelier Division**
Source Location:	**623 West Monroe, Montpelier, Indiana 47359**
County:	**Blackford**
SIC Code:	**3069**
Operation Permit No.:	**T 009-7492-00002**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from BRC Rubber Group, Montpelier Division relating to the operation of a miscellaneous automotive rubber parts manufacturing and coating source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) natural gas-fired boiler, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.

(b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.

(c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.

(d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.

(e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.

(f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993,exhausting to Stack S8, capacity: 280 automotive parts per hour.

(g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity:2,000 automotive parts per hour.

(i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.

(j) Three (3) hand paint stations, known HPB1 - HPB3, capacity:

(k) One (1) dip and spin adhesive system, known as DIPSPIN, installed in 1997, exhausting to Stack S12a, capacity: 35,000 automotive parts per hour.

(l) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.

(m) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.

(n) One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.

(o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.

(p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour.

(q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.

(r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.

(s) One (1) chain-on-edge dried, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.

(t) One (1) paint booth (silver machine), known as PB8, equipped with dry filter for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 450 automotive parts per hour.

(u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new emission units requiring prior approval for the construction and operation pursuant to 326 IAC 2-7-5(16).

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Combustion source flame safety purging on startup.

(b) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(c) Closed loop heating and cooling systems.

(d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(e) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(g) Paved and unpaved roads and parking lots with public access.

(h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) Other emergency equipment as follows: stationary fire pumps.

(k) Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day.

(1) PMILL, RPRCSS rubber making/primary mill.

(2) SMILL, RPRCSS rubber making/secondary mill.

(3) RCOAT, rubber coating.

(4) PMIX, primary, Banbury mixer.

(5) SMIX, secondary, Shaw mixer.

(6) SBlAST, self-contained sand blaster.

(7) CSILOs, three (3) carbon silos.

(8) Phosline phosphate line.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP #05-04-85-0049, issued April 22, 1981.

(b) OP #05-05-89-0058, issued May 28, 1985.

(c) Request to transfer permit OP #05-05-89-0058, issued May 28, 1985 from Shellar Globe to BRC Rubber Group dated December 29, 1993.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*. The GBLAST2, PB8, and DIP have been installed, but have not been not operated.

(b) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of review was received on December 12, 1996. Additional information was received on April 3, 15 and 21, 1997, February 17, 1998 and April 1, 1999. An administratively complete and totally reorganized Part 70 permit application for the purposes of this review was received on May 19, 1999. Additional information was received on July 6, 1999, August 9, 1999, as well as January 14, February 1 and March 8, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations on pages 1 through 16.

The HAPs calculations submitted by the applicant have been verified and found to be accurate and correct. A summary of these calculations are provided in Appendix A of this document in Appendix A on page 15 of 16.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	244
PM_{10}	244
SO_2	0.077
VOC	204
CO	10.8
NO_X	12.8

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

The total potential to emit for HAPs is overly conservative, and unrealistic since it is a sum of the worst case single HAPs for this automotive parts job shop source.

HAPs	Potential To Emit (tons/year)
Xylene	121
Toluene	51.7
Tetrachloroethylene	0.660
Formaldehyde	1.22
Ethyl Benzene	21.1
Lead Compounds	9.84
Trichloroethylene	29.4
MIBK	81.2
MEK	34.5
Methanol	4.72
Cobalt Compounds	0.520
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source.

Pollutant	**Actual Emissions** (tons/year)
PM	1.30
PM_{10}	1.30
SO_2	0.06
VOC	31.7
CO	0.870
NO_X	1.04
Xylene	14.5
Toluene	4.87
Tetrachloroethylene	0.02
Formaldehyde	0.07
Ethyl Benzene	1.70
Lead Compounds	0.80
Trichloroethylene	3.18
MIBK	4.14
MEK	1.61
Methanol	0.90
Cobalt Compounds	0.02
Combination of HAPs	31.8

Although no previous emission data have been received from the source, the above actual emissions were abstracted from GSD-08 of the application.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Boilers	0.240	0.970	0.080	0.070	10.8	12.8	0.231
PB1, 2, 3 & 5	1.98	1.98	0.00	49.5	0.00	0.00	144
PB4	0.231	0.231	0.00	11.5	0.00	0.00	30.2
PB6 & 7	0.449	0.449	0.00	22.8	0.00	0.00	56.6
DIPSPIN	0.00	0.00	0.00	<25.0	0.00	0.00	24.4
HDIP & DLINE	0.00	0.00	0.00	9.22	0.00	0.00	3.79
PB8	0.236	0.236	0.00	11.2	0.00	0.00	Single HAP< 10 12.1
DIP	0.00	0.00	0.00	11.3	0.00	0.00	5.85
HPB1, 2 & 3	0.00	0.00	0.00	34.4	0.00	0.00	65.2
FSTOR	0.00	0.00	0.00	1.68	0.00	0.00	1.68
VDG	0.00	0.00	0.00	12.0	0.00	0.00	12.0
GBLAST1 &2	2.15	2.15	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	5.0	5.0	1.00	5.00	3.00	2.00	3.00
Total Emissions	10.286	11.016	1.08	193.67	13.8	14.8	359

Note, the total potential to emit for HAPs for multiple units is overly conservative, and unrealistic since it is a sum of the worst case single HAPs for this automotive parts job shop for each emission unit type and the entire source.

County Attainment Status

The source is located in Blackford County.

Pollutant	**Status**
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Blackford County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The two (2) natural gas-fired boilers, BLR1 and BLR2, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c), Subpart Dc since both boilers were constructed in 1979 and 1980, prior to the June 9, 1989 applicability date for this NSPS.

(b) The vapor degreaser, known as VDG, is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460, Subpart T). Attached is a copy of the federal rule. The vapor degreaser is an open top batch vapor machine with a solvent/air interface of 1.39355 square meters.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart T.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

(a) A Preventive Maintenance Plan is not required for the shot blasters, known as GBLAST1 and GBLAST2, even though each of these emission units does have controls and the controls must be operated in order to comply with 326 IAC 6-3-2, the allowable PM emission rate is less than ten (10) pounds per hour, each.

(b) A Preventive Maintenance Plan is required for the vapor degreaser, known as VDG, because this unit is subject to a NESHAP, Subpart T.

(c) A Preventive Maintenance Plan is not required for the two (2) natural gas-fired boilers, known as BLR1 and BLR2, because the actual emissions from each boilers are below twenty-five (25) tons per year each and they do not have controls.

(d) A Preventive Maintenance Plan is required for the dip and spin adhesive system, known as DIPSPIN, since a VOC emission limit has been accepted to avoid the applicability of 326 IAC 8-1-6.

(e) A Preventive Maintenance Plan is not required for FSTOR because the actual emissions from this facility is less twenty-five (25) tons per year and does not have a control device.

(f) A Preventive Maintenance Plan is not required for the following emission units (paint booths, PB1 through PB8, HDIP, HPB1 through HPB3, and DIP) have actual VOC emissions less than twenty-five (25) tons per year, each.

326 IAC 2-2 Prevention of Significant Deterioration

This modification is a minor modification to an existing minor PSD source since all emissions, after controls and limits, are less than two hundred and fifty (250) tons per year and the source is not considered to be one of the 28 major PSD source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The source will be considered an existing major PSD source after the construction of this modification since PM and PM_{10} emissions after controls and limits will exceed two hundred and fifty (250) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year in Blackford County. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New source toxics control)

(a) The DIPSPIN constructed in 1997 has potential emissions of a single HAP and a combination of HAPs that exceed the major source levels of ten (10) and twenty-five (25) tons per year, respectively. The source has agreed to limit the emissions of a single HAP to less than ten (10) tons per year and a combination of HAPs to less than twenty-five (25) tons per year and thus this rule does not apply.

(b) The potential single and combination of HAPs emissions from PB8 and DIP constructed after the July 1997 applicability date are each less than the major HAPs threshold levels. PB8 and DIP operate independently of the previously installed emission units and also are independent of each other. Therefore, these operations are each not major for HAPs and thus this rule does not apply to either PB8 or DIP.

326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating)

The 16.74 and 12.50 million British thermal units per hour rated boilers, both constructed and placed into operation prior to September 21, 1983, are subject to 326 IAC 6-2 (Particulate Emissions

Limitations for Sources of Indirect Heating).

Pursuant to 326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (a)), particulate matter emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}}$$

Pt = lbs of PM emitted per MMBtu heat input
C = maximum ground level concentration (default = 50 ug/m^3)
a = plume rise factor (default = 0.67 for Q less than 1,000 MMBtu/hr)
h = stack height in feet (minimum height = 22.75 feet)
Q = total source maximum operating capacity (29.24)
N = number of stacks in fuel burning operation (2)

$$Pt = \frac{50 \text{ ug/m}^3 * 0.67 * 22.75}{76.5 * 29.24^{0.75} * 2^{0.25}} = 0.666$$ pounds of particulate matter emitted per MMBtu heat input

As shown on page 1 of 16 of Appendix A for the boiler combustion, the PM emissions from the two (2) boilers are 0.0019 pounds per million British thermal units heat input. Therefore, the boilers comply with this rule.

326 IAC 8-1-6 (New facilities: general reduction requirements)

Although the potential VOC emissions from DIPSPIN are greater than twenty-five (25) tons per year, the source has agreed to limit the actual VOC emission to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

The potential VOC emissions from each of the paint booths, PB1 through PB8, HPB1, HPB2 and HPB3, HDIP and DIP are each less than twenty-five (25) tons per year and therefore are not subject to the requirements of this rule. The potential VOC emissions from are also each less than twenty-five (25) tons per year and therefore are not subject to the requirements of this rule.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The source is not one (1) of the listed source types in 326 IAC 8-2-9(a)(1)-(4). Although the source coats miscellaneous metal parts, the source is exempt from the requirements of this rule since its SIC Code of 3069 is not in the major groups of #33, #34, #35, #36, #37, #38 or #39 pursuant to 326 IAC 8-2-9(a)(5).

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) overspray from the paint booths, known as PB 1 through PB8, will be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

(b) The allowable particulate matter (PM) emission rate from the grit blasters, known as GBLAST1 and GBLAST2, shall not exceed 3.10 and 3.82 pounds per hour, when operating at a process weight rates of 0.660 and 0.90 tons per hour, respectively. The allowable PM emission rate is calculated with the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouses shall be in operation at all times the grit blasters are in operation, in order to comply with these limits.

326 IAC 8-3-3 (Open top vapor degreaser operation)

The vapor degreaser, known as VDG, is subject to this rule. The owner or operator of an open top vapor degreaser shall:

(a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;

(b) keep the cover closed at all times except when processing work loads through the degreaser;

(c) minimize solvent carryout by:

(1) racking parts to allow complete drainage;

(2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);

(3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

(4) tipping out any pools of solvent on the cleaned parts before removal; and

(5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;

(d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;

(e) not occupy more than half of the degreaser's open top area with the workload;

(f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;

(g) never spray above the vapor level;

(h) repair solvent leaks immediately, or shut down the degreaser;

(i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;

(j) not use workplace fans near the degreaser opening;

(k) not allow visually detectable water in the solvent exiting the water separator; and

(l) provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 20-6 (Halogenated Solvent Cleaning)

The vapor degreaser, known as VDG, installed in 1997 with a capacity of 2.7 pounds of trichloroethylene per hour is subject to this rule which incorporates the requirements of 40 CFR 63 Subpart T.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The grit blasters, known as GBLAST1 and GBLAST2 have applicable compliance monitoring conditions as specified below:

(1) Visible emissions notations of the grit blast stack exhausts S15a and S15b shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(2) The Permittee shall record the total static pressure drop across the baghouses controlling the grit blasting systems, at least once per shift when the grit blasting systems are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 to 8.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for the blasting processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) PB1 through PB8 have applicable compliance monitoring conditions as specified below:

Monthly inspections shall be performed of the coating emissions from the exhaust stacks and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 and 326 IAC 2-7 (Part 70).

(c) DIPSPIN has applicable compliance monitoring conditions as specified below:

The amount of VOC, any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

These monitoring conditions are necessary to ensure compliance with VOC and HAPs emission limits to avoid the requirements of 326 IAC 8-1-6 and 326 IAC 2-7 (Part 70).

(d) VDG have applicable compliance monitoring conditions as specified below:

Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

(a) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.

(b) The Permittee shall monitor the hoist speed as described below:

(1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.

(2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.

(3) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.

(4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

(c) The Permittee shall establish the monitoring frequency for each control and submit it to the commissioner for approval in the initial test report.

These monitoring conditions are necessary to ensure compliance with Subpart T and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached summary of detailed air toxic calculations is given in Appendix A, on pages 15 of 16.

Conclusion

The operation of this miscellaneous automotive rubber parts manufacturing and coating source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 009-7492-00002.**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: **BRC Rubber Group, Montpelier Division**
Address City IN Zip: **623 West Monroe, Montpelier, Indiana 47349**
Part 70: **T 009-7492**
Plt ID: **009-00002**
Reviewer: **Mark L. Kramer**
Date: **December 12, 1996**

BLR1 = 16.74 MMBtu/hr
BLR2 = 12.50 MMBtu/hr

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
29.2	256.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.243	0.973	0.077	12.8	0.704	10.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: BRC Rubber Group, Montpelier Division
Address City IN Zip: 623 West Monroe, Montpelier, Indiana 47349
Part 70: T 009-7492
Plt ID: 009-00002
Reviewer: Mark L. Kramer
Date: December 12, 1996

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.689E-04	1.537E-04	9.605E-03	2.305E-01	4.354E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.404E-05	1.409E-04	1.793E-04	4.867E-05	2.689E-04

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC , HAPs and Particulate
From Surface Coating Operations On Primarily Metal Automotive Parts & Some Nylon and Plastic Parts & nylon and plastic parts

Company Name: BRC Rubber Group, Montpelier Division
Address City IN Zip: 623 West Monroe, Montpelier, Indiana 47349
Part 70: T 009-7492
Plt ID: 009-00002
Reviewer: Mark L. Kramer
Date: December 12, 1996

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 1, 2, 3, 5 Primer																
Chemlock 205 for Part #s																
308045	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.009375	32	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
30776221	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.006383	47	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
30776222	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.003000	100	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
30821803	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000150	2000	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
308045001	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.009375	32	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
3042482001	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000250	1200	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
3042483001	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000536	560	5.91	5.91	1.77	42.54	7.76	2.00	45.11	20%
3078632103	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000214	1400	5.91	5.91	1.77	42.55	7.77	2.00	45.11	20%
3079792103	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000750	400	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
3079792203	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.002000	150	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
3079800003	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.006977	43	5.91	5.91	1.77	42.54	7.76	2.00	45.11	20%
300159001	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000465	645	5.91	5.91	1.77	42.54	7.76	2.00	45.11	20%
300159002	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000857	350	5.91	5.91	1.77	42.54	7.76	2.00	45.11	20%
3012580012	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000250	1200	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
301258002	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000250	1200	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
301580022	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000250	1200	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
30137700212	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000375	800	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
304174002	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.001200	250	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
300245001	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000475	632	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
3013860002	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.001579	190	5.91	5.91	1.77	42.54	7.76	2.00	45.11	20%
3041200002 (Rubber or Plastic)	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000417	720	5.91	5.91	1.77	42.55	7.77	2.00	45.11	20%
300915	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.000240	1250	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
30413701102	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.001205	249	5.91	5.91	1.77	42.54	7.76	2.00	45.11	20%
Chemlock 307 for Part #s																
3043100022	7.49	80.35%	0.0%	80.4%	0.00%	10.25%	0.000222	1350	6.02	6.02	1.80	43.29	7.90	1.55	58.71	20%
3043110112	7.49	80.35%	0.0%	80.4%	0.00%	10.25%	0.000150	2000	6.02	6.02	1.81	43.33	7.91	1.55	58.71	20%
Niles Black Primer for Part #s																
500159/500160	9.61	61.91%	49.5%	12.4%	57.11%	26.16%	0.001714	175	2.78	1.19	0.36	8.59	1.57	3.85	4.56	20%
Worst Case									**6.02**	**6.02**	**1.81**	**43.33**	**7.91**	**3.85**	**58.71**	
State Potential Emissions						**Control Eff**	**VOC**	**0%**	**Uncontrolled**		**1.81**	**43.33**	**7.91**	**3.85**		
							PM	**90%**	**Controlled**		**1.81**	**43.33**	**7.91**	**0.385**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 1, 2, 3, 5 Solvent																
MEK for Part #s																
308045	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.003125	32	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
30776221	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.002128	47	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
30776222	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.001000	100	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
30821803	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000050	2000	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
308045001	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.003125	32	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3042482001	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000083	1200	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3042483001	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000179	560	6.71	6.71	0.67	16.11	2.94	0.00	n/a	100%
3078632103	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000071	1400	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3079792103	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000250	400	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3079792203	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000667	150	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3079800003	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.002326	43	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
300159001	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000155	645	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
300159002	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000286	350	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3012580012	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000083	1200	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
301258002	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000083	1200	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
301580022	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000083	1200	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
30137700212	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000125	800	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
304174002	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000400	250	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
300245001	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000158	632	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3013860002	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000526	190	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3041200002 (Rubber or Plastic)	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000139	720	6.71	6.71	0.67	16.11	2.94	0.00	n/a	100%
300915	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000080	1250	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
30413701102	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000402	249	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3043100022	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000074	1350	6.71	6.71	0.67	16.11	2.94	0.00	n/a	100%
3043110112	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.000050	2000	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
Worst Case MEK									**6.71**	**6.71**	**0.67**	**16.11**	**2.94**	**0.00**	**0.00**	

Worse Case Primer Plus Worse Case MEK											**2.48**	**59.44**	**10.85**	**3.85**	**0.00**	

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 1, 2, 3, 5 Adhesive																
Chemlock 252 for Part #s																
308045	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.009375	32	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
30776221	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.006383	47	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
30776222	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.003000	100	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
30821803	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.000150	2000	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
308045001	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.009375	32	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
3042482001	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.000250	1200	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
3042483001	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.000536	560	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
3078632103	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.000214	1400	6.20	6.19	1.86	44.58	8.14	1.94	45.29	20%
3079792103	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.000750	400	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
3079792203	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.002000	150	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
3079800003	8.04	77.03%	0.03%	77.0%	0.20%	13.67%	0.006977	43	6.20	6.19	1.86	44.57	8.13	1.94	45.29	20%
Chemlock EP6788-50 for Part #s																
300159001	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000465	645	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
300159002	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000857	350	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
3012580012	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000250	1200	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
301258002	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000250	1200	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
301580022	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000250	1200	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
30137700212	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000375	800	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
304174002	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.001200	250	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
Chemlock 233 for Part #s																
300245001	9.19	76.00%	0.05%	76.0%	0.05%	24.00%	0.00047	632	6.98	6.98	2.09	50.26	9.17	2.32	29.08	20%
Chemlock 236A for Part #s																
3013860002	8.44	83.03%	0.0%	83.0%	0.00%	16.97%	0.00158	190	7.01	7.01	2.10	50.45	9.21	1.51	41.29	20%
Chemlock 238 for Part #s																
3041200002 (Rubber or Plastic)	7.61	82.54%	0.0%	82.5%	0.00%	17.46%	0.00042	720	6.28	6.28	1.88	45.23	8.25	1.40	35.98	20%
Chemlock 252X for Part #s																
300915	8.04	77.03%	0.03%	77.0%	0.02%	13.67%	0.00024	1250	6.19	6.19	1.86	44.57	8.13	1.94	45.29	20%
30413701102	8.04	77.03%	0.03%	77.0%	0.02%	13.67%	0.00120	249.000	6.19	6.19	1.86	44.57	8.13	1.94	45.29	20%
Chemlock EP6887-35 for Part #s																
3043100022	8.19	73.90%	0.03%	73.9%	0.03%	15.85%	0.00022	1350.000	6.05	6.05	1.81	43.52	7.94	2.24	38.17	20%
3043110112	8.19	73.90%	0.03%	73.9%	0.03%	15.85%	0.00015	2000.000	6.05	6.05	1.81	43.56	7.95	2.25	38.17	20%
Chemlock 252X for Part #s																
3041020012	8.04	77.03%	0.03%	77.0%	0.02%	13.67%	0.00045	673.000	6.19	6.19	1.86	44.58	8.14	1.94	45.29	20%
Chemlock 205X for Part #s																
301525001	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00030	1000.000	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
Chemlock 220X for Part #s																
3002310002	8.17	75.20%	0.0%	75.2%	0.00%	14.40%	0.00150	200.000	6.14	6.14	1.84	44.24	8.07	2.13	42.67	20%
Chemlock 250X for Part #s																
3001610012	7.93	74.53%	0.0%	74.5%	0.00%	12.40%	0.00050	600.000	5.91	5.91	1.77	42.55	7.77	2.12	47.66	20%
3011030012	7.93	74.53%	0.0%	74.5%	0.00%	12.40%	0.00025	1200.000	5.91	5.91	1.77	42.55	7.77	2.12	47.66	20%
Chemlock 253X for Part #s																
3001600022	8.27	74.38%	0.02%	74.4%	0.02%	14.23%	0.00058	520.000	6.15	6.15	1.84	44.28	8.08	2.23	43.22	20%
Emralon 308																
404262	10.35	54.59%	36.8%	17.8%	45.79%	21.94%	0.00071	420.000	3.39	1.84	0.55	13.23	2.41	4.94	8.37	20%
4040008	10.35	54.59%	36.8%	17.8%	45.79%	21.94%	0.00071	420.000	3.39	1.84	0.55	13.23	2.41	4.94	8.37	20%
4408022	10.35	54.59%	36.8%	17.8%	45.79%	21.94%	0.00071	420.000	3.39	1.84	0.55	13.23	2.41	4.94	8.37	20%
30410002	10.35	54.59%	36.8%	17.8%	45.79%	21.94%	0.00071	420.000	3.39	1.84	0.55	13.23	2.41	4.94	8.37	20%
44080012	10.35	54.59%	36.8%	17.8%	45.79%	21.94%	0.00071	420.000	3.39	1.84	0.55	13.23	2.41	4.94	8.37	20%
404090008	10.35	54.59%	36.8%	17.8%	45.79%	21.94%	0.00071	420.000	3.39	1.84	0.55	13.23	2.41	4.94	8.37	20%
404262008	10.35	54.59%	36.8%	17.8%	45.79%	21.94%	0.00071	420.000	3.39	1.84	0.55	13.23	2.41	4.94	8.37	20%
Chemlock EP6887-35 for Part #s																
3043760022	8.19	73.90%	0.030%	73.9%	0.03%	15.85%	0.00120	250.000	6.05	6.05	1.81	43.56	7.95	2.25	38.17	20%
Worst Case									**7.01**	**7.01**	**2.10**	**50.45**	**9.21**	**4.94**	**47.66**	
State Potential Emissions						**Control Eff**	**VOC**	**0.0**	**Uncontrolled**		**2.10**	**50.45**	**9.21**	**4.94**		
							PM	**0.9**	**Controlled**		**2.10**	**50.45**	**9.21**	**0.494**		

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 1, 2, 3, 5 Solvent																
Xylene																
308045	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.003125	32	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
30776221	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.002128	47	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
30776222	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.001000	100	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
30821803	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000050	2000	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
308045001	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.003125	32	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3042482001	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000083	1200	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
3042483001	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000179	560	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3078632103	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000071	1400	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
3079792103	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000250	400	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3079792203	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000667	150	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3079800003	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.002326	43	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
300159001	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000155	645	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
300159002	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000286	350	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3012580012	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000083	1200	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
301258002	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000083	1200	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
301580022	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000083	1200	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
30137700212	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000125	800	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
304174002	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000400	250	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
300245001	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000158	632	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
3013860002	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000526	190	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3041200002 (Rubber or Plastic)	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000139	720	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
300915	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.000080	1250	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
30413701102	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00040	249	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3043100022	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00007	1350	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3043110112	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00005	2000	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3041020012	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00015	673	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
MEK																
301525001	6.71	100.00%	0.0%	100.0%	0.0%	0.0%	0.00010	1000	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
Xylene																
3002310002	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00050	200	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3001610012	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00017	600	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3011030012	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00008	1200	7.24	7.24	0.72	17.37	3.17	0.00	n/a	100%
3001600022	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00019	520	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
404262	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00000	420	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
4040008	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00000	420	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
4408022	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00000	420	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
30410002	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00000	420	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
44080012	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00000	420	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
404090008	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00000	420	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
404262008	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00000	420	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
3043760022	7.24	100.00%	0.0%	100.0%	0.0%	0.0%	0.00040	250	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
Worst Case Xylene									**7.24**	**7.24**	**0.72**	**17.38**	**3.17**	**0.00**		
Worst Case MEK									**6.71**	**6.71**	**0.67**	**16.10**	**2.94**	**0.00**		
Worse Case Adhesive + Xylene											**2.83**	**67.84**	**12.38**			

Summary **Potential Emissions Uncontrolled (tons/yr)** **Potential Emissions After Controls (tons/yr)**

PB 1, 2, 3, 5 Per Booth	VOC	PM	MEK	Xylene	Primer/Adhesive+ Solvent VOC	Primer/Adhesive+ Solvent PM	VOC	PM
Primer	7.91	3.85	0.00	0.00	**10.85**	**3.85**	**10.85**	0.385
Solvent	0.00	0.00	2.94	0.00				
Adhesive	9.21	4.94	0.00	0.00	**12.38**	**4.94**	**12.38**	0.494
Solvent	0.00	0.00	2.94	3.17				
Worse Case Primer or Adhesive + Solvent per Booth					**12.38**	**4.94**	**12.38**	**0.494**
Total 4 booths					**49.5**	**19.76**	**49.5**	**1.976**

PB4

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 4 Primer																
Chemlock EP6887-35 for Parts #																
304410002	not used							220.000								
Chemlock 205X for Parts #																
3072922103	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00110	264.000	5.91	5.91	1.72	41.18	7.52	1.93	45.11	20%
3072922303	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00150	200.000	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
Worst Case									**5.91**	**5.91**	**1.77**	**42.55**	**7.76**	**2.00**	**45.11**	
							VOC	**0%**	**Uncontrolled**		**1.77**	**42.55**	**7.76**	**1.998**		
							PM	**90%**	**Controlled**		**1.77**	**42.55**	**7.76**	**0.200**		

PB 4 Solvent																
MEK for Parts #																
304410002	not used							220.000								
3072922103	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00040	264.000	6.71	6.71	0.71	17.01	3.10	0.00	n/a	20%
3072922303	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00050	200.000	6.71	6.71	0.67	16.10	2.94	0.00	na/	20%
Worst Case									**6.71**	**6.71**	**0.71**	**17.01**	**3.10**	**0.00**	**n/a**	
							VOC	**0%**	**Uncontrolled**		**0.71**	**17.01**	**3.10**	**0.00**	**n/a**	

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 4 Adhesive																
Chemlock EP6887-35 for Parts #																
304410002	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00140	220.000	6.05	6.05	1.86	44.72	8.16	2.31	38.17	20%
Chemlock 253X for Parts #																
3072922103	8.27	74.38%	0.0%	74.4%	0.02%	14.23%	0.00110	264.000	6.15	6.15	1.79	42.86	7.82	2.16	43.22	20%
3072922303	8.27	74.38%	0.0%	74.4%	0.02%	14.23%	0.00150	200.000	6.15	6.15	1.84	44.28	8.08	2.23	43.22	20%
Worst Case									**6.15**	**6.15**	**1.86**	**44.72**	**8.16**	**2.31**	**43.22**	
							VOC	**0%**	**Uncontrolled**		**1.86**	**44.72**	**8.16**	**2.307**		
							PM	**90%**	**Controlled**		**1.86**	**44.72**	**8.16**	**0.231**		

PB 4 Solvent																
Xylene for Parts #																
304410002	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00050	220.000	7.24	7.24	0.80	19.11	3.49	0.00	n/a	20%
3072922103	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00040	264.000	7.24	7.24	0.76	18.35	3.35	0.00	n/a	20%
3072922303	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00050	200.000	7.24	7.24	0.72	17.38	3.17	0.00	na/	20%
Worst Case									**7.24**	**7.24**	**0.76**	**18.35**	**3.35**	**0.00**	**n/a**	
							VOC	**0%**	**Uncontrolled**		**0.76**	**18.35**	**3.35**	**0.000**		

Summary **Potential Emissions Uncontrolled (tons/yr)** **Potential Emissions After Controls (tons/yr)**

PB4	VOC	PM	MEK	Xylene	Primer/Adhesive+ Solvent VOC	Primer/Adhesive+ Solvent PM	VOC	PM
Primer	7.76	2.00	0.00	0.00	**10.87**	**2.00**	**10.87**	0.200
Solvent	0.00	0.00	3.10	0.00				
Adhesive	8.16	2.31	0.00	0.00	**11.51**	**2.31**	**11.51**	0.231
Solvent	0.00	0.00	0.00	3.35				
Worse Case Primer or Adhesive + Solvent					**11.51**	**2.31**	**11.51**	**0.231**

PB 6 & 7 (Parts may receive a primer in one booth and go through the dryer (CDRY6) and receive a cover coat in the 2nd booth and go through a 2nd dryer (CDRY7)).

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 6 & 7 Primer																
Chemlock 205 for Parts #																
3042010012	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00016	1900.000	5.91	5.91	1.80	43.11	7.87	2.02	45.11	20%
3016540022	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00030	1000.000	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
301525002	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00015	2000.000	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
301595012	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00062	480.000	5.91	5.91	1.76	42.20	7.70	1.98	45.11	20%
3015510132	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00100	300.000	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
304174001	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00035	850.000	5.91	5.91	1.76	42.19	7.70	1.98	45.11	20%
3013810032	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00062	480.000	5.91	5.91	1.76	42.20	7.70	1.98	45.11	20%
Chemlock EP6887-35 for Parts #																
3043760012	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00030	1000.000	6.05	6.05	1.81	43.56	7.95	2.25	38.17	20%
304410001	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00025	1200.000	6.05	6.05	1.81	43.56	7.95	2.25	38.17	20%
Chemlock 205 for Parts #																
307408	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00092	325.000	5.91	5.91	1.77	42.40	7.74	1.99	45.11	20%
3072922203	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00035	850.000	5.91	5.91	1.76	42.19	7.70	1.98	45.11	20%
3072922403	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00060	500.000	5.91	5.91	1.77	42.55	7.76	2.00	45.11	20%
Worst Case									**6.05**	**6.05**	**1.81**	**43.56**	**7.95**	**2.25**	**45.11**	
							VOC	**0%**	**Uncontrolled**		**1.81**	**43.56**	**7.95**	**2.247**		
							PM	**90%**	**Controlled**		**1.81**	**43.56**	**7.95**	**0.225**		
PB 6 & 7 Solvent																
MEK for Parts #																
3042010012	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00005	1900	6.71	6.71	0.64	15.30	2.79	0.00	n/a	20%
3016540022	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00010	1000	6.71	6.71	0.67	16.10	2.94	0.00	n/a	20%
301525002	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00005	2000	6.71	6.71	0.67	16.10	2.94	0.00	n/a	20%
301595012	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00021	480	6.71	6.71	0.68	16.23	2.96	0.00	na/	20%
3015510132	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00033	300	6.71	6.71	0.66	15.94	2.91	0.00	n/a	20%
304174001	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00012	850	6.71	6.71	0.68	16.43	3.00	0.00	n/a	20%
3013810032	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00021	480	6.71	6.71	0.68	16.23	2.96	0.00	n/a	20%
Xylene for Parts #																
3043760012	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00010	1000	7.24	7.24	0.72	17.38	3.17	0.00	n/a	20%
304410001	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00008	1200	7.24	7.24	0.70	16.68	3.04	0.00	n/a	20%
MEK for Parts #																
307408	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00031	325	6.71	6.71	0.68	16.22	2.96	0.00	n/a	20%
3072922203	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00012	850	6.71	6.71	0.68	16.43	3.00	0.00	n/a	20%
3072922403	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	500	6.71	6.71	0.67	16.10	2.94	0.00	n/a	20%
Worst Case									**7.24**	**7.24**	**0.72**	**17.38**	**3.17**	**0.00**	**n/a**	
							VOC	**0%**	**Uncontrolled**		**0.72**	**17.38**	**3.17**	**0.000**		
Worst Case Xylene									**7.24**	**7.24**	**0.72**	**17.38**	**3.17**	**0.00**		
Worst Case MEK									**6.71**	**6.71**	**0.68**	**16.43**	**3.00**	**0.00**		

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 6 & 7 Adhesive																
Chemlock EP6788-50 for Parts #																
3042010012	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000160	1900.000	6.14	6.14	1.87	44.79	8.17	2.18	41.34	20%
3016540022	8.19	74.96%	0.0%	75.0%	0.00%	14.85%	0.000300	1000.000	6.14	6.14	1.84	44.20	8.07	2.16	41.34	20%
Chemlock 220X for Parts #																
301525002	8.17	75.20%	0.0%	75.2%	0.00%	14.40%	0.00015	2000.000	6.14	6.14	1.84	44.24	8.07	2.13	42.67	20%
Chemlock 252X for Parts #																
301595012	8.04	77.03%	0.0%	77.0%	0.00%	13.10%	0.00062	480.000	6.19	6.19	1.84	44.23	8.07	1.93	47.28	20%
3015510132	8.04	77.03%	0.0%	77.0%	0.00%	13.10%	0.00100	300.000	6.19	6.19	1.86	44.59	8.14	1.94	47.28	20%
Chemlock EP6788-50 for Parts #																
304174001	8.19	74.96%	0.0%	75.0%	0.00%	13.10%	0.00035	850.000	6.14	6.14	1.83	43.83	8.00	2.14	46.86	20%
3013810032	8.19	74.96%	0.0%	75.0%	0.00%	13.10%	0.00062	480.000	6.14	6.14	1.83	43.85	8.00	2.14	46.86	20%
Chemlock EP6887-35 for Parts #																
3043760012	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00030	1000.000	6.05	6.05	1.81	43.56	7.95	2.25	38.17	20%
304410001	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00025	1200.000	6.05	6.05	1.81	43.56	7.95	2.25	38.17	20%
Chemlock 220X for Parts #																
307408	8.17	75.20%	0.0%	75.2%	0.00%	14.40%	0.00092	325.000	6.14	6.14	1.84	44.09	8.05	2.12	42.67	20%
Chemlock 252X for Parts #																
3072922203	8.04	77.03%	0.03%	77.0%	0.02%	13.67%	0.00035	850.000	6.19	6.19	1.84	44.20	8.07	1.93	45.29	20%
3072922403	8.04	77.03%	0.03%	77.0%	0.02%	13.67%	0.00060	500.000	6.19	6.19	1.86	44.57	8.13	1.94	45.29	20%
Worst Case									**6.19**	**6.19**	**1.87**	**44.79**	**8.17**	**2.25**	**47.28**	
							VOC	**0%**	**Uncontrolled**		**1.87**	**44.79**	**8.17**	**2.247**		
							PM	**90%**	**Controlled**		**1.87**	**44.79**	**8.17**	**0.225**		

PB 6 & 7 Solvent																
Xylene for Parts #																
3042010012	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00005	1900	7.24	7.24	0.69	16.51	3.01	0.00	n/a	20%
3016540022	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00010	1000	7.24	7.24	0.72	17.38	3.17	0.00	n/a	20%
301525002	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00005	2000	7.24	7.24	0.72	17.38	3.17	0.00	n/a	20%
301595012	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00021	480	7.24	7.24	0.73	17.52	3.20	0.00	na/	20%
3015510132	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00033	300	7.24	7.24	0.72	17.20	3.14	0.00	n/a	20%
304174001	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00012	850	7.24	7.24	0.74	17.72	3.23	0.00	n/a	20%
3013810032	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00021	480	7.24	7.24	0.73	17.52	3.20	0.00	n/a	20%
3043760012	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00010	1000	7.24	7.24	0.72	17.38	3.17	0.00	n/a	20%
304410001	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00008	1200	7.24	7.24	0.70	16.68	3.04	0.00	n/a	20%
307408	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00031	325	7.24	7.24	0.73	17.51	3.19	0.00	n/a	20%
3072922203	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00012	850	7.24	7.24	0.74	17.72	3.23	0.00	n/a	20%
3072922403	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	500	7.24	7.24	0.72	17.38	3.17	0.00	n/a	20%
Worst Case									**7.24**	**7.24**	**0.74**	**17.72**	**3.23**	**0.00**	**n/a**	
							VOC	**0%**	**Uncontrolled**		**0.74**	**17.72**	**3.23**	**0.000**		

Summary **Potential Emissions Uncontrolled (tons/yr)** **Potential Emissions After Controls (tons/yr)**

					Primer/Adhesive+ Solvent			
PB 6 & 7	**VOC**	**PM**	**MEK**	**Xylene**	**VOC**	**PM**	**VOC**	**PM**
Per Booth								
Primer	7.95	2.247	0.00	0.00	**11.12**	**2.247**	**11.12**	**0.225**
Solvent	0.00	0.000	3.00	3.17				
Adhesive	8.17	2.247	0.00	0.00	**11.41**	**2.247**	**11.41**	**0.225**
Solvent	0.00	0.000	0.00	3.23				
Worse Case Primer or Adhesive + Solvent per Booth					**11.41**	**2.247**	**11.41**	**0.225**
Total 2 booths					**22.8**	**4.49**	**22.8**	**0.449**

DIPSPIN

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
DIPSPIN Primer																
Chemlock 205 for Parts #																
305046 (Rubber or Plastic)	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00003	35000	5.91	5.91	6.41	153.87	28.08	0.00	45.11	100%
305047	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00031	3500	5.91	5.91	6.41	153.87	28.08	0.00	45.11	100%
Chemlock 8007 for Parts #																
	9.60	67.67%	64.6%	3.1%	74.4%	21.84%	0.00031	3500	1.15	0.29	0.32	7.67	1.40	0.00	1.35	100%
	9.60	67.67%	64.6%	3.1%	74.4%	21.84%	0.00031	3500	1.15	0.29	0.32	7.67	1.40	0.00	1.35	100%
Worst Case									**5.91**	**5.91**	**6.41**	**153.87**	**28.08**	**0.00**	**45.11**	

DIPSPIN Solvent																
MIBK for Parts #																
305046 (Rubber or Plastic)	6.67	100.00%	0.0%	100.0%	0.00%	0.00%	0.00001	35000	6.67	6.67	2.10	50.43	9.20	0.00	n/a	100%
305047	6.67	100.00%	0.0%	100.0%	0.00%	0.00%	0.00009	3500	6.67	6.67	2.10	50.43	9.20	0.00	n/a	100%
Worst Case									**6.67**	**6.67**	**2.10**	**50.43**	**9.20**	**0.00**	**n/a**	

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
DIPSPIN Adhesive																
Chemlock 253X for Part #s																
305046 (Rubber or Plastic)	8.27	74.38%	0.02%	74.4%	0.02%	14.23%	0.00003	35000	6.15	6.15	6.46	154.97	28.28	0.00	43.22	100%
305047	8.27	74.38%	0.02%	74.4%	0.02%	14.23%	0.00030	3500	6.15	6.15	6.46	154.97	28.28	0.00	43.22	100%
Chemlock 8560 for Parts #																
	9.58	55.02%	55.0%	0.0%	63.9%	36.09%	0.00031	3500	0.01	0.00	0.00	0.10	0.02	0.00	0.01	100%
Chemlock 8210 for Parts #																
	9.14	72.56%	68.8%	3.8%	75.6%	19.92%	0.00031	3500	1.40	0.34	0.37	8.93	1.63	0.00	1.72	100%
Chemlock 252X for Parts #																
3048550012	8.04	77.03%	0.0%	77.0%	0.00%	13.10%	0.00009	12500	6.19	6.19	6.81	163.50	29.84	0.00	47.28	100%
Worst Case									**6.19**	**6.19**	**6.81**	**163.50**	**29.84**	**0.00**	**47.28**	

DIPSPIN Solvent																
Xylene for Parts #																
305046 (Rubber or Plastic)	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.000009	35000	7.24	7.24	2.28	54.73	9.99	0.00	n/a	100%
305047	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.000090	3500	7.24	7.24	2.28	54.73	9.99	0.00	n/a	100%
	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.000000	0	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.000000	0	7.24	7.24	0.00	0.00	0.00	0.00	na/	100%
3048550012	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.000008	12500	7.24	7.24	0.72	17.38	3.17	0.00	na/	100%
Worst Case									**7.24**	**7.24**	**2.28**	**54.73**	**9.99**	**0.00**	**n/a**	

Summary	**Potential Emissions (tons/yr)**				**Primer/Adhesive+ Solvent**	
DIPSPIN	**VOC**	**PM**	**MIBK**	**Xylene**	**VOC**	**PM**
Primer	28.08	0.000	0.00	0.00	**37.28**	**0.000**
Solvent	0.00	0.000	9.20	0.00		
Adhesive	29.84	0.000	0.00	0.00	**39.83**	**0.000**
Solvent	0.00	0.000	0.00	9.99		
Worse Case Primer or Adhesive + Solvent					**39.83**	**0.000**

HDIP & DLINE

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
HDIP & DLINE Adhesive																
Chemlock 608 for Part #s																
3042000032	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00040	782	4.55	4.54	1.42	34.10	6.22	0.00	15.32	100%
3042000042	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00040	782	4.55	4.54	1.42	34.10	6.22	0.00	15.32	100%
304456002	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00050	560	4.55	4.54	1.27	30.53	5.57	0.00	15.32	100%
3044562002	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00050	560	4.55	4.54	1.27	30.53	5.57	0.00	15.32	100%
3045000002	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00300	100	4.55	4.54	1.36	32.71	5.97	0.00	15.32	100%
3045010002	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00300	100	4.55	4.54	1.36	32.71	5.97	0.00	15.32	100%
3044670002 (Rubber or Plastic)	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00030	1000	4.55	4.54	1.36	32.71	5.97	0.00	15.32	100%
3040561002	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00040	782	4.55	4.54	1.42	34.10	6.22	0.00	15.32	100%
3040562002	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00040	782	4.55	4.54	1.42	34.10	6.22	0.00	15.32	100%
3011040012	7.22	63.03%	0.11%	62.9%	0.08%	29.66%	0.00030	1000	4.55	4.54	1.36	32.71	5.97	0.00	15.32	100%
Worst Case									**4.55**	**4.54**	**1.42**	**34.10**	**6.22**	**0.00**	**15.32**	

HDIP & DLINE Solvent																
IPA for Parts #																
3042000032	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00013	782	6.57	6.57	0.69	16.44	3.00	0.00	n/a	100%
3042000042	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00013	782	6.57	6.57	0.69	16.44	3.00	0.00	n/a	100%
304456002	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00017	560	6.57	6.57	0.61	14.72	2.69	0.00	n/a	100%
3044562002	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00017	560	6.57	6.57	0.61	14.72	2.69	0.00	n/a	100%
3045000002	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00100	100	6.57	6.57	0.66	15.77	2.88	0.00	n/a	100%
3045010002	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00100	100	6.57	6.57	0.66	15.77	2.88	0.00	n/a	100%
3044670002 (Rubber or Plastic)	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00010	1000	6.57	6.57	0.66	15.77	2.88	0.00	n/a	100%
3040561002	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00013	782	6.57	6.57	0.69	16.44	3.00	0.00	n/a	100%
3040562002	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00013	782	6.57	6.57	0.69	16.44	3.00	0.00	n/a	100%
3011040012	6.57	100.00%	0.00%	100.0%	0.00%	0.00%	0.00010	1000	6.57	6.57	0.66	15.77	2.88	0.00	n/a	100%
Worst Case									**6.57**	**6.57**	**0.69**	**16.44**	**3.00**	**0.00**	n/a	

Summary **Potential Emissions (tons/yr)**

HDIP & DLINE	**VOC**	**PM**	**IPA**	**Adhesive+ Solvent VOC**	**Adhesive+ Solvent PM**
Adhesive	6.22	0.000	0.00	**9.22**	**0.000**
Solvent	0.00	0.000	3.00		

PB 8 (Silver Machine)

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB 8 Silver Machine Adhesive																
Chemlock EP6887-35 for Parts #																
304410002	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00070	450.000	6.05	6.05	1.91	45.74	8.35	2.36	38.17	20%
4376	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00070	450.000	6.05	6.05	1.91	45.74	8.35	2.36	38.17	20%
Worst Case									**6.05**	**6.05**	**1.91**	**45.74**	**8.35**	**2.36**	**38.17**	
							VOC	**0%**	**Uncontrolled**		**1.91**	**45.74**	**8.35**	**2.359**		
							PM	**90%**	**Controlled**		**1.91**	**45.74**	**8.35**	**0.236**		

PB 8 Silver Machine Solvent																
Xylene for Parts #																
304410002	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	450.000	7.24	7.24	0.65	15.64	2.85	0.00	n/a	100%
4376	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	450.000	7.24	7.24	0.65	15.64	2.85	0.00	n/a	100%
Worst Case									**7.24**	**7.24**	**0.65**	**15.64**	**2.85**	**0.00**	**n/a**	**100%**

Summary **Potential Emissions (tons/yr)**

PB 8 (Silver Machine)	**VOC**	**PM**	**Xylene**	**Adhesive+ Solvent VOC**	**Adhesive+ Solvent PM**
Adhesive	8.35	2.359	0.00	**11.20**	**2.359**
Solvent	0.00	0.000	2.85		

Potential Emissions After Controls (tons/yr)

Adhesive+ Solvent VOC	**Adhesive+ Solvent PM**
11.2	**0.236**

DIP

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
DIP Adhesive																
Chemlock 252X for Parts #																
5046 (Rubber or Plastic)	8.04	77.03%	0.03%	77.0%	0.02%	13.67%	0.00030	1000	6.19	6.19	1.86	44.57	8.13	0.00	45.29	100%
Chemlock 8210 for Parts #																
5046 (Rubber or Plastic)	9.14	72.56%	68.7%	3.9%	75.6%	19.92%	0.00030	1000	1.45	0.35	0.11	2.55	0.47	0.00	1.78	100%
Worst Case									**6.19**	**6.19**	**1.86**	**44.57**	**8.13**	**0.00**	**45.29**	

DIP Solvent																
Xylene for Parts #																
5046 (Rubber or Plastic)	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00010	1000.000	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
Worst Case									**7.24**	**7.24**	**0.72**	**17.38**	**3.17**	**0.00**	**n/a**	

Summary **Potential Emissions (tons/yr)**

DIP	**VOC**	**PM**	**Xylene**	**Adhesive+ Solvent VOC**	**PM**
Adhesive	8.13	0.000	0.00	**11.31**	**0.000**
Solvent	0.00	0.000	3.17		

HPB 1 - 3

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
HPB 1 -3 Primer																
Chemlock 205 for Parts #																
3015510022	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.00300	100	5.91	5.91	1.77	42.55	7.76	0.00	45.11	100%
3015510112	7.81	75.66%	0.0%	75.7%	0.00%	13.10%	0.01200	25	5.91	5.91	1.77	42.55	7.76	0.00	45.11	100%
Chemlock 8007 for Parts #																
3041520003	9.60	67.67%	64.6%	3.1%	74.4%	21.84%	0.00086	350	1.15	0.29	0.09	2.12	0.39	0.00	1.35	100%
Worst Case									**9.00**	**6.50**	**1.95**	**46.77**	**8.53**	**0.00**	**45.11**	

HPB 1 -3 Primer																
MEK for Parts #																
3015510022	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00100	100	6.71	6.71	0.67	16.10	2.94	0.00	n/a	100%
3015510112	6.71	100.00%	0.0%	100.0%	0.00%	0.00%	0.00400	25	6.71	6.71	0.67	16.10	2.94	0.00	na/	100%
Worst Case									**6.71**	**6.71**	**0.67**	**16.10**	**2.94**	**0.00**	**n/a**	

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
HPB 1 -3 Adhesive																
Chemlock 253X for Parts #																
3015510022	8.27	74.38%	0.0%	74.4%	0.02%	14.23%	0.00300	100	6.15	6.15	1.84	44.28	8.08	0.00	43.22	100%
3015510112	8.27	74.38%	0.0%	74.4%	0.02%	14.23%	0.01200	25	6.15	6.15	1.84	44.28	8.08	0.00	43.22	100%
Chemlock 8560 for Parts #																
301595001	9.58	55.02%	55.0%	0.0%	63.9%	36.09%	0.00330	90	0.01	0.00	0.00	0.03	0.00	0.00	0.01	100%
301595022	9.58	55.02%	55.0%	0.0%	63.9%	36.09%	0.00910	33	0.01	0.00	0.00	0.03	0.01	0.00	0.01	100%
301595032	9.58	55.02%	55.0%	0.0%	63.9%	36.09%	0.00910	33	0.01	0.00	0.00	0.03	0.01	0.00	0.01	100%
Ty Ply BN																
300918	7.98	62.60%	16.3%	46.3%	13.38%	25.04%	0.00160	185	4.26	3.69	1.09	26.24	4.79	0.00	14.75	100%
Chemlock 8560 for Parts #																
3041520003	9.58	55.02%	55.0%	0.0%	63.9%	36.09%	0.00090	350	0.01	0.00	0.00	0.03	0.01	0.00	0.01	100%
Worst Case									**6.15**	**6.15**	**1.84**	**44.28**	**8.08**	**0.00**	**43.22**	

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
HP 1-3 Solvent																
Xylene for Parts #																
3015510022	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00100	100	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
3015510112	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00400	25	7.24	7.24	0.72	17.38	3.17	0.00	n/a	100%
301595001	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00000	90	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
301595022	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00000	33	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
301595032	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00000	33	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
300918	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00000	185	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
3041520003	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00000	350	7.24	7.24	0.00	0.00	0.00	0.00	n/a	100%
Worst Case									**7.24**	**7.24**	**0.72**	**17.38**	**3.17**	**0.00**	**n/a**	

Summary **Potential Emissions Uncontrolled (tons/yr)** **Potential Emissions After Controls (tons/yr)**

					Primer/Adhesive+ Solvent			
HPB 1-3 Per Booth	**VOC**	**PM**	**MEK**	**Xylene**	**VOC**	**PM**	**VOC**	**PM**
Primer	8.53	0.00	0.00	0.00	**11.47**	**0.00**	**11.47**	0.000
Solvent	0.00	0.00	2.94	0.00				
Adhesive	8.08	0.00	0.00	0.00	**11.25**	**0.00**	**11.25**	0.000
Solvent	0.00	0.00	0.00	3.17				
Worse Case Primer or Adhesive + Solvent					**11.47**	**0.00**	**11.47**	**0.000**
Total 3 booths					**34.4**	**0.0**	**34.4**	**0.0**

FSTOR Potential VOC emissions based on engineering judgement are from storage of 55 gallon drums **1.68** tons per year

Sealed drums of adhesives, solvents and all coatings are stored in FSTOR.
Drums being used (up to 10 at a time) are mixed continuously, but sealed.

Maximum storage capacity is approximately: 3050 gallons
(including solvent and water based coatings)
Dispense liquid a maximum of 2 times/day, 5-10 gallon/time, takes approximately 15 minutes
13,000 cfm fan runs all the time.

Assume 1 % loss from drums being dispensed. 1%
Assume 0.01 % loss from standing per day 0.01%
Assume 0.1 % loss from mixing per day. (10 drums being mixed) 0.10%

	actual	**8 hr operation**		**potential**	**24 hr operation**	
Volume dispensed	20	gallons/day		60	gallons/day	
	10	gallon/hr		10	gallon/hr	
Average Density	8	lb/gal		8	lb/gal	
max storage	3050	gallons		3050	gallons	
Max throughput	13000	gallons/yr		13000	gallons/yr	
	52	tons/yr		52	tons/yr	
Dispensing losses	1.60	lb/day	5 d/wk	4.80	lb/day	7 d/wk
Dispensing losses	416.00	lb/yr		1752.00	lb/yr	
standing losses	10.40	lb/yr		10.40	lb/yr	
mixing losses	1606.0	lb/yr		1606.00	lb/yr	
Total losses/yr	2032.4	lb/yr		3368.40	lb/yr	
	1.02	tons/yr		**1.68**	tons/yr	
Total losses/hr	0.2320	lb/hr	avg	0.3845	lb/hr	avg

To be conservative assume all stored is xylene and VOC.

VDG

The vapor degreaser is used to degrease some parts prior to surface coating operation.

Assume all trichloroethylene lost.

18,000-28,000 parts are degreased/ hour

Approximately 1.82 gal /day of trichloroethylene is used per day

density 12.04 lb/gal

21.91 lb/day trichloroethylene used

8 hrs/day

2.74	**lbs/hr**	**potential emissions**
2.85	**tons/year**	**actual emissions**
12.00	**tons/year**	**potential emissions**

SUMMARY OF POTENTIAL VOC EMISSIONS FROM SURFACE COATINGS (tons per year)

	POTENTIAL EMISSIONS		POTENTIAL EMISSIONS AFTER CONTROLS	
EMISSION UNITS	**VOC**	**PM**	**VOC**	**PM**
PB1, 2, 3 & 5	49.520	19.763	49.520	1.976
PB4	11.510	2.307	11.510	0.231
PB6 & PB7	22.818	4.494	22.818	0.449
DIPSPIN	39.828	0.000	39.828	0.000
HDIP & DLINE	9.224	0.000	9.224	0.000
PB8	11.201	2.359	11.201	0.236
DIP	11.306	0.000	11.306	0.000
HPB1-3	34.421	0.000	34.421	0.000
FSTOR	1.680	0.000	1.680	0.000
VDG	11.997	0.000	11.997	0.000
Total	**203.5**	**28.92**	**203.5**	**2.892**

Company Name: **BRC Rubber Group, Montpelier Division**
Address City IN Zip: **623 West Monroe, Montpelier, Indiana 47349**
Part 70: **T 009-7492**
Plt ID: **009-00002**
Reviewer: **Mark L. Kramer**
Date: **December 12, 1996**

GBLAST1 & GBLAST2

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
GBLAST1	99.0%	0.015	1860.0	23.9	104.74	0.239	1.05
GBLAST2	99.0%	0.015	1950.0	25.1	109.81	0.251	1.10

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Allowable Rate of Emissions

	Process Rate Parts (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Allowable Emissions (tons/yr)
GBLAST1	1320	0.66	3.10	13.6
GBLAST2	1800	0.90	3.82	16.7

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^0.67

Appendix A:
HAPs Summary
Applicant HAPs Calculations Have Been Checked and Confirmed

Company Name: BRC Rubber Group, Montpelier Division
Address City IN Zip: 623 West Monroe, Montpelier, Indiana 47349
Part 70: T 009-7492
Plt ID: 009-00002
Reviewer: Mark L. Kramer
Date: December 12, 1996

Worst Case
Potential HAPs Emissions (tons per year)

Emission	Xylene	Toluene	Tetrachloroethylene	Formaldehyde	Ethyl Benzene	Lead Compounds	Trichloroethylene	MIBK	MEK	Methanol	Cobalt Compounds	Total
Unit												
PB1	10.23	6.46	0.11	0.10	2.02	1.07	4.35	8.40	3.14	0.00	0.13	36.0
PB2	10.23	6.46	0.11	0.10	2.02	1.07	4.35	8.40	3.14	0.00	0.13	36.0
PB3	10.23	6.46	0.11	0.10	2.02	1.07	4.35	8.40	3.14	0.00	0.13	36.0
PB5	10.23	6.46	0.11	0.10	2.02	1.07	4.35	8.40	3.14	0.00	0.13	36.0
Subtotal	40.92	25.84	0.44	0.40	8.08	4.28	17.40	33.60	12.56	0.00	0.52	**144.0**
PB4	10.00	6.46	0.00	0.10	1.57	0.54	0.00	8.40	3.14	0.00	0.00	30.2
PB6	10.15	6.46	0.11	0.10	1.62	0.54	0.00	6.16	3.14	0.00	0.00	28.3
PB7	10.15	6.46	0.11	0.10	1.62	0.54	0.00	6.16	3.14	0.00	0.00	28.3
Subtotal	20.30	12.92	0.22	0.20	3.24	1.08	0.00	12.32	6.28	0.00	0.00	**56.6**
DIPSPIN	10.00	0.00	0.00	0.13	1.61	1.07	0.00	8.40	3.14	0.00	0.00	24.4
HDIP & DIPLINE	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.79	0.00	3.79
PB8	4.79	6.46	0.00	0.00	0.32	0.54	0.00	0.00	0.00	0.00	0.00	12.1
DIP	3.17	0.00	0.00	0.00	1.61	1.07	0.00	0.00	0.00	0.00	0.00	5.85
HPB1	10.00	0.00	0.00	0.13	1.57	0.42	0.00	6.16	3.14	0.31	0.00	21.7
HPB2	10.00	0.00	0.00	0.13	1.57	0.42	0.00	6.16	3.14	0.31	0.00	21.7
HPB3	10.00	0.00	0.00	0.13	1.57	0.42	0.00	6.16	3.14	0.31	0.00	21.7
Subtotal	30.00	0.00	0.00	0.39	4.71	1.26	0.00	18.48	9.42	0.93	0.00	**65.2**
FSTOR	1.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.68
VDG	0.00	0.00	0.00	0.00	0.00	0.00	12.00	0.00	0.00	0.00	0.00	12.0
Total	**120.9**	**51.7**	**0.66**	**1.22**	**21.1**	**9.84**	**29.4**	**81.2**	**34.5**	**4.72**	**0.520**	**355.8**